

DELTA PROTECTION COMMISSION

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July 21, 2005

Mr. Paul Dabbs
Statewide Planning Branch
CA Dept. of Water Resources
P.O. Box 942836
Sacramento, CA 94236-0001

Subject: Comments on Public Review Draft of California Water Plan Update 2005

Dear Mr. Dabbs:

I am writing in response to the Public Review Draft of the California Water Plan Update, dated April 2005.

The Delta Protection Commission is a State agency, created under the Delta Protection Act of 1992 (Act), with land use planning responsibility over the Primary Zone of the Legal Delta. Under the Act, the Commission was tasked with issuing a regional land use plan focused on protection and enhancement of the agricultural, environmental (habitat), and recreational land uses of the Delta. The Commission adopted its Land Use and Resource Management Plan for the Primary Zone of the Legal Delta in 1995, and has been implementing this plan through its coordination with local governments. As the Commission does not have planning authority over State and federal government actions in the Delta, the comments within this letter are advisory only.

Many of the Commission's comments on earlier iterations of this draft have been incorporated into the document (specifically, that the Delta is now included in the document as a distinct region due to its importance to the State).

However, the information in Volume 3, Chapter 12 of the document the Delta Regional Report is outdated information and should be updated in light of more recent developments in the Delta area. For example:

- Starting with page 12-13, there is mention of a "Delta Recreation Master Plan"; the document states funding for its preparation has not been secured. In fact, money was secured and has been expended for the first phase of this Plan, which has begun to address user and facility needs for water-based and water-enhanced recreation in the Delta. The Delta Protection Commission continues to work with its consultant, the Department of Parks and Recreation, and the California Coastal Commission to

obtain funding to complete the second phase of the plan. This second phase would be focused more on land-based recreation needs, and would also include further analysis of the "big picture" of recreation in the Delta. (Within the "Ongoing Planning Efforts" box, second-to-last bullet, the word "proposed" should be eliminated.)

- On page 12-14, there is discussion of the Delta Improvements Program, which includes "increasing conveyance capacity of the Delta pumping plants (to improve water supply reliability Statewide)." Further down on the page (under the Water Supply Reliability section's discussion of the Delta Improvements Package, first bullet), there is mention of the proposal under the South Delta Improvements to ramp its exports up to 8,500 cfs. Due to the California Bay-Delta Authority's current refocusing on the decline of pelagic fish populations in the Delta, the decision on whether to increase exports has been put on hold for at least the next couple of years, until ongoing scientific studies can yield useful information to that decision. It seems worthwhile to update the discussion of the Delta Improvements Project with this caveat.
- Similarly, with the Authority's refocusing of its efforts on Delta pelagic fish populations, there has been recent discussion of not expending any more funds on the study of storage projects that do not appear to be economically feasible at this time (such as the In-Delta Storage Project discussed on page 12-15). The discussion of storage projects should be updated in terms of the direction the Authority is currently taking with respect to all of these projects.
- Under the topic of water supply reliability the document should include discussion of the "Delta Region Water Quality Management Plan" that is being pursued by the Solano County Water Agency, Contra Costa Water District, and the City of Stockton. All three of these entities are currently studying or planning new water intake facilities in the Delta. In addition, the entities are investigating treatment technologies and source water protection actions. This effort was initiated as part of the California Water Plan Update's focus on the development of Integrated Regional Water Management (Recommendation 2), and is worthy of mention in the Delta Regional Report. Discussion of the Freeport Regional Water Project should also be included.
- On page 12-20, last paragraph, the information on the Delta Recreation Master Plan is outdated; the first phase of the contract has been completed, and there is now an effort underway to obtain funding for a second phase.

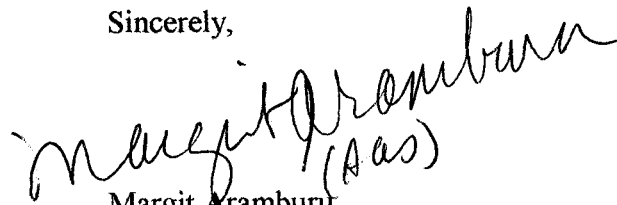
Regarding the development of "regional water portfolios" which are to be achieved through investigation of "integrated water management plans" with regional perspectives (as part of its fourteen Recommendations, starting on page 5-5 of Volume 1 of the document), the Delta is a unique area in terms of its importance to the State, and needs a multi-faceted regional water plan. At this time in the Delta, the "integrated water management plan" under development by a few urban water agencies, consists of issues identified by regional drinking water suppliers in the Delta and Bay areas. While this

"plan" is still under development, it does not include a lot of information about what other water management and/or treatment options are being investigated. There is no regional endorsement of this plan at this time; a regional water portfolio would need to address needs for Delta agriculture, water-contact recreation, and aquatic habitat.

Generally, the use of the three "scenarios" that provide a range of options for evaluating future water needs based on population growth, ag and industrial, and environmental trends, is a prudent way to proceed with future updates. It is important that DWR develop better tools to analyze these options and needs, and develop good "response packages" in future iterations of the California Water Plan.

I appreciate the opportunity to review and submit this feedback on the public review draft of the California Water Plan Update, and look forward to seeing how some of the new concepts embodied in this version will play out in future evaluations of California water needs. Please call me with any questions about these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Margit Aramburu" with "(AAS)" written below it.

Margit Aramburu
Executive Director

Cc: Mike McGowan, Chairman
Commissioner Kathy Kelly
Ron Ott, CALFED Bay Delta Authority